

Mr. Craig Middleton  
Executive Director  
Presidio Trust  
34 Graham Street  
P.O. Box 29052  
San Francisco, CA 94129-0052

**RE: Comments on Revised Draft Main Post Update and Draft Finding of Effect for the Main Post Update to the Presidio Trust Management Plan, Presidio of San Francisco National Historic Landmark District, San Francisco, California**

Dear Mr. Middleton:

On March 10, 2009, the Advisory Council on Historic Preservation (ACHP) received copies of the revised draft Main Post Update and draft Finding of Effect for the Main Post Update to the Presidio Trust Management Plan (PTMP) undertaking. Since the ACHP first elected to participate in this undertaking in November 2007, we have encouraged the Presidio Trust to use an inclusive and transparent consultation process in its decision to revise the management plan for the Main Post Planning District. We appreciate that the Presidio Trust has worked diligently to meet that standard and has taken into consideration comments received from consulting party members throughout 2008 and attempted to address those concerns in both the Revised Draft Main Post Update and Draft Finding of Effect.

We appreciate the Presidio Trust's decision to supplement Stipulation X of the Programmatic Agreement for the PTMP with the steps set forth in Subpart B of 36 CFR Part 800, *Protection of Historic Properties*. Stipulation X is somewhat restrictive in the review of planning documents whereas Subpart B (36 CFR §§ 800.3-6) offers all parties an opportunity to review and comment. Accordingly, we note for the record that we are at the step in the Section 106 consultation process of providing comment on the definition of the undertaking and on the finding of effect of the undertaking on historic properties. This comports with the provisions of Stipulation X(C) and 36 CFR § 800.5(d).

Section 110(f) of the National Historic Preservation Act (NHPA), 36 CFR § 800.10(a), and Stipulation X of the PTMP Programmatic Agreement require the Presidio Trust, to the maximum extent possible, to undertake planning and actions that will minimize harm to the National Historic Landmark (NHL) status of the Presidio of San Francisco. The Revised Draft Main Post Update illustrates the Presidio Trust's effort in developing a revised management plan for the Main Post while taking into account the property's NHL status. To the ACHP this revised draft is more comprehensive as compared to the previous draft Main Post Update provided to consulting party members last year. Many of the projects outlined in the Revised Draft Main Post Update

have now been reevaluated and adapted to further minimize effects to the integrity of historic properties previously found in the original Main Post Update.

The ACHP agrees with the Presidio Trust's finding that the undertaking will have an adverse effect on the NHL District. The Draft Finding of Effect is comprehensive in its analysis of how the undertaking would alter the characteristics of the historic property that qualify it as a historic property under 36 CFR § 800.5(a)(2). We recommend that the Draft Finding of Effect be amended to consider the effects of the *Main Parade: Greening the Heart of the Park* project. We understand that the Main Parade may not have been included in the Draft Finding of Effect due to the completed Environmental Assessment for the rehabilitation of the Main Parade Ground in 2007. However, the ACHP understands that the Main Parade portion of the Revised Draft Main Post Update is not the same project outlined as the Preferred Alternative in the 2007 Environmental Assessment and should be properly assessed under the current consultation process. The primary function of an Environmental Assessment and Finding of No Significant Impact (FONSI) is to assist a federal agency in determining whether it should prepare an Environmental Impact Statement under the National Environmental Policy Act for a proposed action. The Main Parade FONSI signed by the Presidio Trust seems to do just that. Rather than actually approving the proposed action, the FONSI simply states that an Environmental Impact Statement would not have to be prepared. Given the purpose of the previous Environmental Assessment and the fact that the current proposal for the Main Parade rehabilitation is fundamentally different than the 2007 proposal, the ACHP recommends that the Presidio Trust include the *Main Parade: Greening the Heart of the Park* in the "Main Post Update Finding of Effect Matrix."

The ACHP encourages the Presidio Trust to take into account our comments, as well as the comments from other consulting party members including the Section 213 Report prepared by the National Park Service, on the Revised Draft Main Post Update and Draft Finding of Effect, including recommendations made in the Section 213 Report, and revise the "Main Post Update Finding of Effect Matrix" found within the Finding of Effect. With these adverse effects clearly identified and articulated, the consulting parties will be able to move forward in the Section 106 process and consider alternatives that could avoid, minimize, or mitigate adverse effects.

Questions regarding the ACHP's participation in this consultation should be directed to Ms. Katharine R. Kerr, Historic Preservation Specialist, at (202) 606-8534 or [kkerr@achp.gov](mailto:kkerr@achp.gov).

Sincerely,

John M. Fowler  
Executive Director